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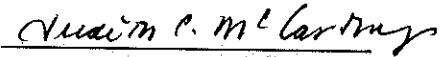
May 1, 2025

Via ECF

The Honorable Judith C. McCarthy United States Magistrate Judge
Southern District of New York
300 Quarropas Street
White Plains, New York 10601

APPLICATION GRANTED

Re: United States v. Justine Ying
Case No.: 7:22-mj-03841-UA-4


Hon. Judith C. McCarthy 5-1-2025

Dear Judge McCarthy:

The undersigned has been appointed to represent Ms. Justine Ying in the above-captioned matter. The defendant, Justine Ying, respectfully moves, pursuant to 18 U.S.C. § 3145(a)(2), to amend the conditions of her release. Ms. Ying seeks an Order from the Court to permit her to travel to visit a friend in Texas from May 16, 2025 through May 21, 2025.

In order to facilitate the defendant's request, the defendant will do the following:

1. Ms. Ying will travel by airplane from Florida to Texas on May 16, 2025, and will return to Florida on May 21, 2025.
2. Prior to traveling outside the Southern District of Florida, Ms. Ying agrees to provide her assigned probation officer with her travel itinerary (including details such as airline, flight number, departure, and arrival times), where she is staying in Texas, and with whom.
3. Upon returning to the Southern District of Florida, Ms. Ying will telephone her probation officer and indicate that she has returned.
4. Ms. Ying communicated her request to United States Pretrial Services Officer Nelson Valenzuela from the Southern District of Florida, who indicated that Probation has no objections to this travel.
5. United States Attorney Benjamin Levander indicated that the government does not object to the requested modification.

Letter to Hon. Judith C. McCarthy
April 29, 2025
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WHEREFORE, the defendant moves that the Court issue an Order permitting the defendant to travel with the advanced notification and approval of her United States Probation Officer, to visit Texas from May 16, 2025 through May 21, 2025, subject to the conditions imposed by her probation officer.

Respectfully Submitted

THE DEFENDANT,
Justine Ying

By: */s/ Bruce D. Koffsky*

BDK/dgb

cc: AUSA Benjamin Levander via email
AUSA Margaret Vasu via email
UPSO Nelson Valenzuela via email